

March 23, 2000

BOARD OF GOVERNORS

Frank J. Fahrenkopf, Jr. Chairman

Senator Bill Bradley Senator Robert J. Dole Honorary Members

William B. Alsup, III
Thomas Hale Boggs, Jr.
Alma Arrington Brown
Mary K. Bush
Vincent H. Cohen
Kathleen W. Collins
Thomas J. Donohue
Joseph D. Duffey
Juanita D. Duggan
Walter R. Fatzinger
Henry J. Ferrero, Jr.
Michael J. Fleming
Craig L. Fuller
Dean I. Garritson

Michael J. Fleming Craig L. Fuller Dean I. Garritson Irving Goldstein Stephen D. Harlan Gerald D. Hines Isaac C. Hunt, Jr. Marie C. Johns James W. Jones James L. Kolstad Gary Jay Kushner M. James Littig Floretta Dukes McKenzie Bob G. Odle Stuart Philip Ross Ralph J. Savarese Daniel C. Schwartz Juan B. Sosa Robert G. Vandemark

Robert B. Washington, Jr.

Timothy J. Waters Joanne W. Young Office of the General Counsel Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

RE: MUR 4984

Letter of March 13, 2000 from
John R. Velasquez, Jr.
Acting Central Enforcement Docket Supervisor

Dear Mr. Velasquez:

I am the Club manager for City Club of Washington, and am, as of March 17, 2000 in receipt of your notice of complaint against City Club of Washington. While your letter directed my attention to Jennifer Boyt, I was informed upon calling your office that this matter had been assigned to Alva Smith at the control of the

through and appropriate the transport of appropriate the first program as a control of a

The February 29, 2000 letter of complaint from Andrew Nickelhoff to Lawrence Noble mistakenly charges that the Rogers for Congress campaign received illegal in-kind contributions from City Club of Washington in Washington D.C. This claim references a recent FEC report filed by the Rogers campaign. Included with your correspondence to City Club of Washington is a copy of a Schedule B - Itemized Disbursements report which I assume was filed by the Rogers campaign with FEC. One of the items identifies City Club of Washington as the recipient of two disbursements listed as In-Kind for Catering.

City Club of Washington is a private club that offers its Members dining facilities and services. Our records reflect we were asked to provide catering service on December 13, 1999 for an AIA Reception (American Insurance Association). We received a deposit from AIA when the reservation was accepted, and a final payment on December 14, 2000, the day after the reception. Please find enclosed a copy of our invoice summarizing the event, the deposit received and final payment due. Also enclosed are copies of the checks we received in payment from AIA for catering services, and copies of their letters to the Rogers campaign identifying these payments as In-Kind contributions by AIA-PAC:

Columbia Square, Concourse Level, 555 13th Street, N.W. Washington, D.C. 20004 202/347-0818



BOARD OF GOVERNORS

Frank J. Fahrenkopf, Jr. Chairman

Senator Robert J. Dole

William B. Alsup, III Thomas Hale Boggs, Jr. Alma Arrington Brown

Bob G. Odle Stuart Philip Ross Ralph J. Savarese Daniel C. Schwartz Juan B. Sosa Robert G. Vandemark Robert B. Washington, Jr. Timothy J. Waters Joanne W. Young

City Club of Washington did not make any contributions of any kind to the Rogers campaign, and has not violated the Federal Election Campaign Act or any other regulation or law. I would be grateful for your assistance in quickly dismissing City Club of Washington from this complaint. While we appreciate the good faith of the Commission in holding matters under review in confidence, we have already been unfairly charged and identified by name in a press release by the Michigan Democratic Party. Until this matter is resolved and the complaint dismissed, my business can continue to expect damaging notoriety. This has been and will be unfair to our Members, our Employees, and to our shared reputation for integrity in our community.

Please provide me with proper notification that City Club of Washington has been dismissed from this complaint.

Sincerely,

Club Manager

Alva Smith CC:

Attachments: Event invoice

Declaration of In-Kind Contribution Letters

*/From AIA-PAC to Rogers campaign (2)

Copied Checks of disbursement (2)

93 4682

828-7120

CITY CLUB DC

2002/002

City Club of Washington

Bill To: SC093

Amount Due:

· Dr. NOO HOLVE

Customer: Melissa Shelk

1130 Connecticut Ave. NW

Suite 1000

Washington, DC 20036

Invoice Date: Work Phone:

\$200,45

12/14/99

Home Phone:

Event Date: 12/13/99 Event Name: AIA Reception	Event Type: Reception Business
Menu: Bar - Liquor: Wine: Beer: Other: Equipment/Services: Miscallaneous: Room Rental: Gratuity: Tax:	\$295.00 \$33.25 \$6.50 \$6.50 \$.00 \$.00 \$.00 \$.00 \$68.25 \$40.95
Total Charge: Less Deposit:	\$450.45



1130 Connecticut Avenue, N.W. ▼ Suite 1000 ▼ Washington, D.C. 20036 ▼ (202) 828-7100

November 23, 1999

Mike Rogers for Congress
PO Box 581
Brighton, MI 48116

Attention: Treasurer

TO WHOM IT MAY CONCERN:

The American Insurance Association Political Action Committee has recorded an in-kind contribution to the 2000 primary election campaign of Open Seat candidate Mike Rogers (R-8-MI), totaling \$250.00. This expense was paid by check no. 2239, dated 11/22/99, payable to the City Club of Washington, for the cost of reserving a room for the December 13th event planned for Mike Rogers. This expense will be reported on our December 20th report to the FEC. To date our total in-kind contributions to the 2000 primary election campaign of Mike Rogers is \$517.24.

If you have any questions regarding this contribution, please do not hesitate to contact me at (202) 828-7120.

Sincerely,

Sean M. McGraw

AIA-PAC Administrator

att filt i til semente til ekkelemen mille til film film film sam kollemenen er eller film mille semen er elle

Martin Harris and Alberta Con-

PAY TO THE ORDER OF	RICAN Federal Account SURANCE T130 Connecticut Ave. MW. Sai ASSOCIATION Washington DC 20036 Qualified as a Multicandidate Committee The City Club of Washington	re. 1000	ASSECTION OF THE PROPERTY OF T	Page 12-2-99 \$ 250.00
]	wo hundred fifty and no/100			
	그렇게 되는 이 이 이 이 분수됐다.			
MEMO	The City Club of Washington 555 13th Street, NW Washington, DC 20004		Lunaul.	1010
/\ /\ · O\	#*************************************	00 - 13 17 OBC	AUTHORIZED	SIGNATUR
भाक्ष	ANCE ASSOCIATION POLITICAL ACTION COMMITTE	======================================		
Date:	11-22-99	Amount	\$250.00	2239
Earma FEC line:	FEC 23			
Delivery	Notes: In-Kind contribution to reserve room			
71 11 Purpose:	In-Kind Contribution: Mike Rogers -	US-HOUSE-MI-8		
Office:	Federal House			
Election:	Primary 2000	•	,	
Recipient	: The City Club of Washington 555 13th Street, NW Washington, DC 20004	Party: State: District:	Republican MI 8	



1130 Connecticut Avenue, N.W. ▼ Suite 1000 ▼ Washington, D.C. 20036 ▼ (202) 828-7100

December 15, 1999

Mike Rogers for Congress PO Box 581 Brighton, MI 48116

Attention: Treasurer

TO WHOM IT MAY CONCERN:

The American Insurance Association Political Action Committee has recorded three inkind contribution to the 2000 primary election campaign of Open Seat candidate Mike Rogers (R-8-MI), totaling \$230.55. The first expense was paid by check no. 2247, dated 12/14/99, payable to the City Club of Washington, in the amount of \$200.45, for the cost of the reception held on December 13, 1999. The second expense was paid by check no. 2248, dated 12/14/99, payable to Premiere Technologies, in the amount of \$15.15, for the cost of broadcast faxing the invitation announcing the Mike Rogers event on December 13, 1999. The third expense was paid by check no. 2249, dated 12/14/99, payable to Premiere Technologies, in the amount of \$14.95, for a second broadcast fax of the invitation announcing the Rogers event on December 13, 1999. These expenses will be reported on our Annual report to the FEC. To date our total in-kind contributions to the 2000 primary election campaign of Mike Rogers is \$747.79.

If you have any questions regarding this contribution, please do not hesitate to contact me at (202) 828-7120.

Sincerely,

Sean M. McGraw

AlA-PAC Administrator

03/21/00	TUE 13:10 FAX 517 374 8	3605					☑ 00
AMERIC, INSURA ASSO				SIGNET BANK SIGNET			2247
	ied as a Multicandidate Committe	98				Date: 12-14-99	
	City Club of Washington					-\$200,45	
Two h	undred and 45/100 *********	*******	*****	****	******	*****	, DOLLARS
555 13	ity Club of Washington ith Street, NW ngton, DC 20004				\cap		F
116	"00002247" : 054	.0008071: 667	_ ?woo	LUN/	AUTHORIZED SIG	UY— GNATURE	1P
	SSOCIATION POLITICAL ACTION CON	MITTEE					
Date:	12-14-99	A	mount:	\$200.45			2247
FEC line:	FEC 23						
Delivery Notes:	In-Kind contribution for Recept	ion held at the City Club	on Dec	cember 13, 199	99.		·
Purpose:	In-Kind Contribution: Mike Rog	ers -US-HOUSE-MI-8					
[™] Office: Election:	Federal House						
Recipient:	Primary 2000 The City Club of Washington 555 13th Street, NW	St	ate:	Republican MI			
	Washington, DC 20004		istrict:	8	•		
	,						
	·	·					